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December 17, 2020

The Honorable Joseph A. Dickson
United States Magistrate Judge
King Fed. Bldg. & United States Courthouse
50 Walnut St., P.O. Box 999
Newark, New Jersey 07101-0999

Re: White, et al. v. Samsung Electronics America, Inc., et al.,
Case No. 17-1775 (MCA)(JAD)
Extension of Time Concerning Briefing Schedule

Dear Honorable Judge Dickson:

By way of this letter, I respectfully request from Your Honor additional time for Plaintiffs to respond to Defendants' instant motions to compel arbitration / class waiver (currently set by Your Honor for 01/06/2020). In our previous Court conference with all the parties, you had indicated that if my medical condition required additional time for me on behalf of Plaintiffs to respond to Defendants' arbitration / class waiver motions, the Court would be amenable to such a request by me.

Unfortunately, despite having received top medical care, my serious and extraordinarily-painful medical issues continue to prevent me from performing my duties as a practicing attorney. And since, as the Court is aware, I am the primary attorney responding to Defendants' current arbitration / class waiver motions, I respectfully the Court ask to extend Plaintiffs' time to respond to Defendants' motions to compel arbitration / class-action waiver until *March 30, 2021*.

Respectfully,

/s/ Mack Press

Counsel for Plaintiffs

Cc: all parties via ECF